IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

SER TECHNOLOGIES, LLC, a Michigan limited liability company, Plaintiff, v. SAUK VALLEY BANK & TRUST CO., and Illinois banking corporation, Defendant.	Case No. 08 CV 7033 Judge Philip G. Reinhard Magistrate Judge P. Michael Mahoney
SAUK VALLEY BANK & TRUST CO., an Illinois banking corporation, Defendant/Third-Party Plaintiff, v. BARCLAY PULLMAN CORPORATION, an Illinois corporation, and CHRIS A. ABBOTT, Third-Party Defendants.	

THIRD-PARTY COMPLAINT

Now comes Defendant/Third-Party Plaintiff Sauk Valley Bank & Trust Co., an Illinois banking corporation ("SVB"), by and through its attorney, Douglas E. Lee of Ehrmann Gehlbach Badger & Lee, and, for its Third-Party Complaint against Barclay Pullman Corporation, an Illinois corporation ("Barclay Pullman"), and Chris A. Abbott ("Abbott"), states as follows:

Parties

1. SVB is an Illinois banking corporation whose principal place of business is located at 201 W. Third St., Sterling, Illinois.

2. Barclay Pullman is an Illinois corporation whose principal place of business is located at 21340 Brady St., Davenport, Iowa. Barclay Pullman is authorized to and does conduct business in the State of Illinois and in the Northern District of Illinois.

3. Upon information and belief, Abbott is a citizen and resident of Lemont, Illinois.

Jurisdiction and Venue

4. This Court has supplemental jurisdiction of the Third-Party Complaint pursuant to 28 U.S.C. §1367(a), in that the Third-Party Complaint seeks indemnification against Barclay Pullman and Abbott for any liability of SVB arising from the civil action for conversion brought by Plaintiff SER Technologies, LLC ("SER"), against SVB. A copy of SER's Complaint is attached hereto.

5. Venue in this district is proper pursuant to 28 U.S.C. §1391(a)(1), in that the underlying dispute and events arose in this judicial district.

6. Venue in the Western Division of this district is proper, in that the underlying dispute and events arose in the Western Division and the principal place of business of SVB is in the Western Division.

COUNT I
(Breach of Transfer Warranties – 810 ILCS 5/3-416)

7. Upon information and belief, during the period of approximately July 2006 through November 2006, SER and Barclay Pullman worked together on various projects for Great Lakes Controlled Energy Corporation, Uniqema, Tuthill, AT & T, Verizon, BEST Access

Systems, Matteson School District #162, Urban Growth Properties, and Evans Electric, LLC (collectively, "the Clients").

8. Upon information and belief, in return for services provided by SER, the Clients paid SER a total of $622,207.20, as indicated in the checks referenced in Plaintiff's Complaint herein ("the Checks").

9. The Checks were made payable to SER.

10. Upon information and belief, after the Checks were received by SER, one or more agents or employees of SER forwarded the Checks to Barclay Pullman.

11. Abbott and/or another employee of Barclay Pullman indorsed the Checks, "Payable to the Order of Barclay Pullman Corp."

12. Abbott and/or another employee of Barclay Pullman transferred the Checks to SVB and received consideration in the form of payment of the Checks.

13. When they transferred the Checks to SVB, Abbott and Barclay Pullman, pursuant to 810 ILCS 5/3-416(a)(1) warranted that Barclay Pullman was entitled to enforce the Checks.

14. Upon information and belief, Barclay Pullman was not entitled to enforce the Checks.

15. Abbott and Barclay Pullman breached the transfer warranty described in 810 ILCS 5/3-416(a)(1) when they transferred the Checks to SVB.

16. When they transferred the Checks to SVB, Abbott and Barclay Pullman, pursuant to 810 ILCS 5/3-416(a)(2), warranted that all signatures on the Checks were authorized.

17. Upon information and belief, the signatures on the Checks were not authorized.

18. Abbott and Barclay Pullman breached the transfer warranty described in 810 ILCS 5/3-416(a)(2) when they transferred the Checks to SVB.

WHEREFORE, Sauk Valley Bank respectfully prays that the Court, if and to the extent Sauk Valley Bank is found liable to SER Technologies under the Complaint filed herein, enter judgment against Chris A. Abbott and Barclay Pullman Corporation, jointly and severally, in the amount of any and all damages, costs, and attorneys' fees for which Sauk Valley Bank is found liable.

COUNT II
(Unjust Enrichment)

1-18. For Paragraphs 1-18 of Count II of its Third-Party Complaint, SVB restates and incorporates herein by reference Paragraphs 1-17 of Count I of its Third-Party Complaint.

19. Abbott and Barclay Pullman induced SVB to make payments of the Checks to Barclay Pullman by transferring the Checks to SVB.

20. Abbott and/or Barclay Pullman knowingly received a benefit by receiving payments when they transferred the Checks to Sauk Valley.

21. Upon information and belief, neither Abbott nor Barclay Pullman gave consideration for the Checks.

22. As a result of the conduct described herein, Abbott and Barclay Pullman have been and will be unjustly enriched at the expense of SVB.

23. Allowing Abbott and Barclay Pullman to retain the benefit would be unjust under the circumstances.

WHEREFORE, Sauk Valley Bank respectfully prays that the Court, if and to the extent Sauk Valley Bank is found liable to SER Technologies under the Complaint filed herein, enter judgment against Chris A. Abbott and Barclay Pullman Corporation, jointly and severally, in the amount of any and all damages, costs, and attorneys' fees for which Sauk Valley Bank is found liable.

COUNT III
(Fraud)

1-23. For Paragraphs 1-23 of Count III of its Third-Party Complaint, SVB restates and incorporates herein by reference Paragraphs 1-23 of Count II of its Complaint.

24. Abbott and/or another individual at Barclay Pullman fraudulently indorsed the Checks in favor of Barclay Pullman knowing such indorsements were false as the Checks were properly payable to SER.

25. Abbott and/or another individual at Barclay Pullman represented to SVB that SER had directed payment of the Checks to Barclay Pullman, which representation, upon information and belief, was false.

26. Abbott and Barclay Pullman fraudulently indorsed the Checks in favor of Barclay Pullman knowing such indorsements were false.

27. When they represented to SVB that SER had directed payment of the Checks to Barclay Pullman, Abbott and/or another individual at Barclay Pullman knew such representation was false.

28. Abbott and/or another individual at Barclay Pullman intended for the false indorsements and representations to induce Sauk Valley to pay Abbott and/or Barclay Pullman the value of the Checks.

29. SVB justifiably relied on the fraudulent indorsements of the Checks and the misrepresentation that SER had directed payment of the Checks to Barclay Pullman.

30. SVB has been damaged by relying on the false indorsements of the Checks and the misrepresentations in that SER has brought a claim for conversion against SVB.

31. SVB, in having to defend the claim for conversion, has suffered damages on account of Barclay Pullman's and Abbott's fraud.

WHEREFORE, Sauk Valley Bank respectfully prays that the Court, if and to the extent Sauk Valley Bank is found liable to SER Technologies under the Complaint filed herein, enter judgment against Chris A. Abbott and Barclay Pullman Corporation, jointly and severally, in the amount of any and all damages, costs, and attorneys' fees for which Sauk Valley Bank is found liable.

SAUK VALLEY BANK & TRUST CO.,
Defendant/Third-Party Plaintiff

By ______________________
Douglas E. Lee

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CERTIFICATE OF SERVICE

Douglas E. Lee, an attorney, hereby certifies that on January 19, 2009, a copy of the foregoing Third-Party Complaint was filed electronically using the Court's CM/ECF system. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system at the e-mail addresses indicated below. Parties may access this filing through the Court's system:

Justin L. Weisberg
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Douglas E. Lee

Received 12-18-08 4:35 p.m.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

SER TECHNOLOGIES, LLC, a Michigan limited liability company,

Plaintiff,

v.

SAUK VALLEY BANK & TRUST CO., an Illinois banking corporation,

Defendant.

FILED: DECEMBER 09, 2008
08CV7033
JUDGE PHILIP G. REINHARD
MAGISTRATE P. MICHAEL MAHONEY

RCC

JURY DEMAND

COMPLAINT

Plaintiff, SER Technologies, LLC, a Michigan limited liability company, through its attorneys Justin L. Weisberg and Thadford A. Felton, Arnstein & Lehr LLP of counsel, states as its complaint against Defendant, Sauk Valley Bank & Trust Co., an Illinois banking corporation, as follows:

Nature Of The Action

1. This is a civil action for conversion brought under Article 3, Section 420, of the Illinois Commercial Code. 810 ILCS 5/3-420.

Jurisdiction And Venue

2. This Court has jurisdiction over this matter pursuant to 28 U.C.S. §1332(a)(1).

3. Venue is proper in the Northern District of Illinois pursuant to 28 U.S.C. §1391(a)(1) as the Defendant resides in the Northern District of Illinois.

The Parties

4. Plaintiff SER Technologies, LLC ("SER Technologies") is a limited liability company duly organized and authorized to do business under the laws of the State of Michigan. SER Technologies' office and principal place of business is at 24650 Sherwood, Center Line, Michigan.

5. The members of SER Technologies are all citizens of the State of Michigan.

6. SER Technologies is a minority business enterprise that is in the business of communications and electrical contracting.

7. Defendant Sauk Valley Bank & Trust Co. is an Illinois banking corporation with its principal place of business at 201 West 3rd Street, Sterling, Illinois.

8. Sometime prior to April 1, 2006, SER Technologies decided to expand its operations to the state of Illinois and began providing electrical contracting services in Illinois.

9. Barclay Pullman Corporation ("Barclay Pullman") is an Illinois corporation that worked with SER Technologies on occasion. The President of Barclay Pullman is Chris A. Abbott ("Abbott").

Great Lakes Checks – $389,341.64

10. During the period of approximately July, 2006 through November, 2006, SER Technologies and Barclay Pullman worked together on a project for Great Lakes Controlled Energy Corporation ("Great Lakes").

11. SER Technologies agreed to provide certain services to Great Lakes in exchange for Great Lake's payment to it for those services.

12. SER Technologies fully performed and provided the agreed upon services to Great Lakes.

13. SER Technologies invoiced Great Lakes a total of $389,341.64 for the services it provided to Great Lakes.

14. In return for those services, Great Lakes paid SER Technologies a total of $389,341.64 by checks.

15. The payments referenced in the preceding paragraph were made as follows:

a. Great Lakes provided SER Technologies with a check payable to SER Technologies in the amount of $84,060 dated July 19, 2006.

b. Great Lakes provided SER Technologies with a check payable to SER Technologies in the amount of $4,510.50 dated September 7, 2006.

c. Great Lakes provided SER Technologies with a check payable to SER Technologies in the amount of $99,495 dated September 22, 2006.

d. Great Lakes provided SER Technologies with a check payable to SER Technologies in the amount of $106,731.70 dated October 18, 2006.

e. Great Lakes provided SER Technologies with a check payable to SER Technologies in the amount of $94,544.44 dated November 21, 2006.

16. The checks referenced in the paragraph above were received on behalf of SER Technologies through an employee of SER Technologies or Abbott acting as agent for SER Technologies.

17. After the above checks were received by SER Technologies, the checks were improperly forwarded to Abbott by an employee of SER Technologies and/or retained by Abbott.

18. Abbott and/or another individual at Barclay Pullman indorsed the Great Lakes' checks in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

19. Specifically, the indorsements on the checks were as follows:

Check No.	Date	Handwritten Indorsement	Stamped Indorsement	Amount
23123	7/19/06	*Pay to the Order of Barclay Pullman Corp. SER Technologies, Inc. LLC*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$84,060.00
23207	9/7/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$4,510.50
38982	9/22/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$99,495.00
23286	10/18/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$106,731.70
23322	11/21/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$94,544.44

See Group Exhibit A attached.

20. None of the above checks were indorsed by an authorized individual at SER Technologies.

21. None of the above checks were properly indorsed by SER Technologies, Inc.

22. SER Technologies has not received any benefit or value from the payments referenced above that were made to it by Great Lakes.

23. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the Great Lakes' checks.

Uniqema Checks – $55,972.02

24. During the period of approximately July, 2006 through September, 2006, Uniqema contracted with SER Technologies.

25. SER Technologies agreed to provide certain services to Uniqema in exchange for Uniqema's payment to it for those services.

26. SER Technologies performed and provided the agreed upon services to Uniqema.

27. SER Technologies invoiced Uniqema a total of $55,972.02 for the services it provided to Uniqema.

28. In return for those services, Uniqema paid SER Technologies a total of $55,972.02 by checks.

29. The payments referenced in the preceding paragraph were made as follows:

a. Uniqema provided SER Technologies with a check payable to SER Technologies in the amount of $6,878.15 dated July 20, 2006.

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b. Uniqema provided SER Technologies with a check payable to SER Technologies in the amount of $1,300 dated August 3, 2006.

c. Uniqema provided SER Technologies with a check payable to SER Technologies in the amount of $4,510.50 dated September 7, 2006.

d. Uniqema provided SER Technologies with a check payable to SER Technologies in the amount of $13,464.92 dated September 8, 2006.

e. Uniqema provided SER Technologies with a check payable to SER Technologies in the amount of $6,972 dated September 21, 2006.

f. Uniqema provided SER Technologies with a check payable to SER Technologies in the amount of $27,356.95 dated September 27, 2006.

30. The checks referenced in the paragraph above were received on behalf of SER Technologies through an employee of SER Technologies.

31. After the above checks were received by SER Technologies, the checks were improperly forwarded to Abbott by an employee of SER Technologies.

32. Abbott and/or another individual at Barclay Pullman indorsed the Uniqema checks in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

33. Specifically, the indorsements on the checks were as follows:

Check No.	Date	Handwritten Indorsement	Stamped Indorsement	Amount
2490410111	7/20/06	*Pay to the Order of Barclay Pullman Corp. SER Technologies, Inc. LLC*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$6,878.15
2490410246	8/3/06	*Pay to the Order of*	Pay to the Order of Sauk	$1,300

		Barclay Pullman Corp.	Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	
2490410624	9/8/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$13,464.92
2490410746		*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$6,972
249041817	9/28/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$27,356.95

See Group Exhibit B attached.

34. None of the above checks were indorsed by an authorized individual at SER Technologies.

35. None of the above checks were properly indorsed by SER Technologies, Inc.

36. SER Technologies has not received any benefit or value from the payments referenced above that were made to it by Uniqema.

37. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the Uniqema checks.

Tuthill Checks – $1,935.55

38. During the period of approximately September, 2006 through September 2006, Tuthill contracted with SER Technologies.

39. SER Technologies agreed to provide certain services to Tuthill in exchange for Tuthill's payment to it for those services.

40. SER Technologies performed and provided the agreed upon services to Tuthill.

41. SER Technologies invoiced Tuthill a total of $1,935.55 for the services it provided to Tuthill.

42. In return for those services, Tuthill paid SER Technologies a total of $1,935.55 by checks.

43. The payments referenced in the preceding paragraph were made as follows:

a. Tuthill provided SER Technologies with a check payable to SER Technologies in the amount of $1,125.50 dated August 25, 2006.

b. Tuthill provided SER Technologies with a check payable to SER Technologies in the amount of $593.80 dated September 8, 2006.

c. Tuthill provided SER Technologies with a check payable to SER Technologies in the amount of $216.25 dated September 15, 2006.

44. The checks referenced in the paragraph above were received on behalf of SER Technologies through an employee of SER Technologies.

45. After the above checks were received by SER Technologies, the checks were improperly forwarded to Abbott by an employee of SER Technologies.

46. Abbott and/or another individual at Barclay Pullman indorsed the Tuthill checks in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of

SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

47. Specifically, the indorsements on the checks were as follows:

Check No.	Date	Handwritten Indorsement	Stamped Indorsement	Amount
15255614	8/25/06	*SER Technologies LLC Payable to Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$1,125.50
15257499	9/8/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$593.08
15259755	9/15/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$216.25

See Group Exhibit C attached.

48. None of the above checks were indorsed by an authorized individual at SER Technologies.

49. None of the above checks were properly indorsed by SER Technologies, Inc.

50. SER Technologies has not received any benefit or value from the payments referenced above that were made to it by Tuthill.

51. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the Tuthill checks.

AT&T Checks – $23,319.99

52. During the period of September, 2006 through October 20, 2006, AT&T contracted with SER Technologies.

53. SER Technologies agreed to provide certain services to AT&T in exchange for AT&T's payment to it for those services.

54. SER Technologies performed and provided the agreed upon services to AT&T.

55. SER Technologies invoiced AT&T a total of $23,319.99 for the services it provided to AT&T.

56. In return for those services, AT&T paid SER Technologies a total of $23,319.99 by checks.

57. The payments referenced in the preceding paragraph were made as follows:

a. AT&T provided SER Technologies with a check payable to SER Technologies in the amount of $19,871.00 dated September 1, 2006.

b. AT&T provided SER Technologies with a check payable to SER Technologies in the amount of $3,448.99 dated October 18, 2006.

58. The checks referenced in the paragraph above were received on behalf of SER Technologies through an employee of SER Technologies.

59. After the above checks were received by SER Technologies, the checks were improperly forwarded to Abbott by an employee of SER Technologies.

60. Abbott and/or another individual at Barclay Pullman indorsed the AT&T checks in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of

SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

61. Specifically, the indorsements on the checks were as follows:

Check No.	Date	Handwritten Indorsement	Stamped Indorsement	Amount
3840072685	9/1/06	*SER Technologies LLC Payable to Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$19,871.00
3840075114	10/18/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$3,448.99

See Group Exhibit D attached.

62. None of the above checks were indorsed by an authorized individual at SER Technologies.

63. None of the above checks were properly indorsed by SER Technologies, Inc.

64. SER Technologies has not received any benefit or value from the payments referenced above that were made to it by AT&T.

65. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the AT&T checks.

Verizon Checks – $368.00

66. In approximately August 2006, Verizon contracted with SER Technologies.

67. SER Technologies agreed to provide certain services to Verizon in exchange for Verizon's payment to it for those services.

68. SER Technologies performed and provided the agreed upon services to Verizon.

69. SER Technologies invoiced Verizon a total of $368.00 for the services it provided to Verizon.

70. In return for those services, Verizon paid SER Technologies a total of $368.00 by check.

71. The check referenced in the paragraph above was received on behalf of SER Technologies through an employee of SER Technologies.

72. After the above check was received by SER Technologies, the check was improperly forwarded to Abbott by an employee of SER Technologies.

73. Abbott and/or another individual at Barclay Pullman indorsed the Verizon check in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

74. Specifically, the check was indorsed as follows:

Check No.	**Date**	**Handwritten Indorsement**	**Stamped Indorsement**	**Amount**
1005179814	8/2/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$368.00

See Exhibit E attached.

75. The Verizon check was not indorsed by an authorized individual at SER Technologies.

76. The Verizon check was not properly indorsed by SER Technologies.

77. SER Technologies has not received any benefit or value from the payment referenced above that was made to it by Verizon.

78. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the Verizon check.

BEST Access Systems Check – $25,653.00

79. In approximately August, 2006, BEST Access Systems contracted with SER Technologies.

80. SER Technologies agreed to provide certain services to BEST Access Systems in exchange for BEST Access System's payment to it for those services.

81. SER Technologies performed and provided the agreed upon services to BEST Access Systems.

82. SER Technologies invoiced BEST Access Systems a total of $25,653.00 for the services it provided to BEST Access Systems.

83. In return for those services, Best Access Systems paid SER Technologies a total of $25,653.00 by check.

84. The check referenced in the paragraph above was received on behalf of SER Technologies through an employee of SER Technologies.

85. After the above check was received by SER Technologies, the check was improperly forwarded to Abbott by an employee of SER Technologies.

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86. Abbott and/or another individual at Barclay Pullman indorsed the BEST Access Systems check in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

87. Specifically, the indorsement on the check was:

Check No.	Date	Handwritten Indorsement	Stamped Indorsement	Amount
356419	8/10/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$25,653.00

See Exhibit F attached.

88. The BEST Access System check was not indorsed by an authorized individual at SER Technologies.

89. The BEST Access System check was not properly indorsed by SER Technologies.

90. SER Technologies has not received any benefit or value from the payment referenced above that was made to it by BEST Access System.

91. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the BEST Access System check.

Matteson School District #162 Check – $47,711.00

92. In approximately September, 2006, Matteson School District #162 contracted with SER Technologies.

93. SER Technologies performed and provided the agreed upon services to Matteson School District #162.

94. SER Technologies invoiced Matteson School District #162 a total of $47,711.00 for the services it provided to Matteson School District #162.

95. In return for those services, Matteson School District #162 provided SER Technologies with a check payable to SER Technologies in the amount of $47,711.00 dated September 19, 2006.

96. The check referenced in the paragraph above was received on behalf of SER Technologies through an employee of SER Technologies.

97. After the above check was received by SER Technologies, the check was improperly forwarded to Abbott by an employee of SER Technologies.

98. Abbott and/or another individual at Barclay Pullman indorsed the Matteson School District #162 check in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

99. Specifically, the indorsement on the check was as follows:

Check No.	**Date**	**Handwritten Indorsement**	**Stamped Indorsement**	**Amount**
92226	9/19/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$47,711.00

See Exhibit G attached.

100. The Matteson School District #162 check was not indorsed by an authorized individual at SER Technologies.

101. The Matteson School District #162 check was not properly indorsed by SER Technologies.

102. SER Technologies has not received any benefit or value from the payments referenced above that was made to it by Matteson School District #162.

103. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the Matteson School District #162 check.

Urban Growth Properties' Check – $306.00

104. In approximately September, 2006, Urban Growth Properties contracted with SER Technologies.

105. SER Technologies agreed to provide certain services to Urban Growth Properties in exchange for Urban Growth Properties' payment to it for those services.

106. SER Technologies performed and provided the agreed upon services to Urban Growth Properties.

107. SER Technologies invoiced Urban Growth Properties a total of $306.00 for the services it provided to Urban Growth Properties.

108. In return for those services, Urban Growth Properties paid SER Technologies a total of $306.00 by check.

109. The check referenced in the paragraph above was received on behalf of SER Technologies through an employee of SER Technologies.

110. After the above check was received by SER Technologies, the check was improperly forwarded to Abbott by an employee of SER Technologies.

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111. Abbott and/or another individual at Barclay Pullman indorsed the Urban Growth Properties check in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

112. Specifically, the indorsement on the check was:

Check No.	Date	Handwritten Indorsement	Stamped Indorsement	Amount
38980		*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$306.00

See Exhibit H attached.

113. The Urban Growth Properties check was not indorsed by an authorized individual at SER Technologies.

114. The Urban Growth Properties check was not properly indorsed by SER Technologies.

115. SER Technologies has not received any benefit or value from the payment referenced above that was made to it by Urban Growth Properties.

116. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the Urban Growth Properties check.

Evans Electric LLC check – $77,600.00

117. In approximately September, 2006, Evans Electric contracted with SER Technologies.

118. SER Technologies agreed to provide certain services to Urban Growth Properties in exchange for Evans Electric's payment to it for those services.

119. SER Technologies performed and provided the agreed upon services to Evans Electric.

120. SER Technologies invoiced Evans Electric a total of $77,600.00 for the services it provided to Evans Electric.

121. In return for those services, Evans Electric paid SER Technologies a total of $77,600.00 by check.

122. The check referenced in the paragraph above was received on behalf of SER Technologies through an employee of SER Technologies.

123. After the above check was received by SER Technologies, the check was improperly forwarded to Abbott by an employee of SER Technologies.

124. Abbott and/or another individual at Barclay Pullman indorsed the Evans Electric check in favor of Barclay Pullman Corp. ("Barclay Pullman") without the consent of SER Technologies and deposited the checks into Barclay Pullman Account No. 100495501 at Defendant Sauk Valley Bank.

125. Specifically, the indorsement on the check was:

Check No.	**Date**	**Handwritten Indorsement**	**Stamped Indorsement**	**Amount**
1145	10/24/06	*Pay to the Order of Barclay Pullman Corp.*	Pay to the Order of Sauk Valle Bank 071125891 For Deposit Only Barclay Pullman Corporation 100495501	$77,600.00

See Exhibit I attached.

126. The Evans Electric check was not indorsed by an authorized individual at SER Technologies.

127. The Evans Electric check was not properly indorsed by SER Technologies.

128. SER Technologies has not received any benefit or value from the payment referenced above that was made to it by Evans Electric.

129. As a result of the foregoing, Defendant Sauk Valley Bank is liable to SER Technologies for the value of the Evans Electric check.

WHEREFORE, Plaintiff SER Technologies, LLC, a Michigan limited liability company, requests that this Court enter the following judgment against Defendant Sauk Valley Bank & Trust:

a. Judgment in the amount of $389,341.64 for the processing of the Great Lakes Controlled Energy Corporation checks;

b. Judgment in the amount of $55,972.02 for the processing of the Uniqema checks;

c. Judgment in the amount of $1,935.55 for the processing of the Tuthill checks;

d. Judgment in the amount of $23,319.99 for the processing of the AT&T checks;

e. Judgment in the amount of $368 for the processing of the Verizon check;

f. Judgment in the amount of $25,653.00 for the processing of the BEST Access Systems check;

g. Judgment in the amount of $47,711.00 for the processing of the Matteson School District #162 check;

h. Judgment in the amount of $306 for the processing of the Urban Growth Properties' check;

i. Judgment in the amount of $77,600 for the processing of the Evans Electric LLC check;

j. Prejudgment interest, costs and such other relief as this Court deems appropriate and just.

SER TECHNOLOGIES, LLC, a Michigan corporation,

By: /s/Thadford A. Felton
One of its Attorneys

Justin L. Weisberg (#6210397)
Thadford A. Felton (#6224896)
Arnstein & Lehr LLP
120 South Riverside Plaza
Suite 1200
Chicago, IL 60606
(312) 876-6934
jlweisberg@arnstein.com
tafelton@arnstein.com

8230641.2

EXHIBIT A

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 7-21-06

SAUK VALLEY BANK & TRUST CO.

TOTAL ITEMS 4 $ 139,551.86

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:2000090010, Amount:$139,551.86, Date:07/24/2006

DDA Deposit $139551.86
100495501
Transit 25
Onus 101 151,122
7/24/06

>071125891<SAUK VLY B&T STERLING IL
POD 1400090008 07-24-2006

Account:100495501-D, Item:2000090010, Amount:$139,551.86, Date:07/24/2006

23123

GREAT LAKES CONTROLLED ENERGY CORPORATION
600 BONNIE LANE
ELK GROVE VILLAGE, IL 60007

AMERICAN CHARTERED BANK
SCHAUMBURG, ILLINOIS 60173
70-2/71-719

7/19/2006

PAY TO THE ORDER OF SER TECHOLOGIES, INC. LLC $ **84,060.00

Eighty-Four Thousand Sixty and 00/100 DOLLARS

SER TECHOLOGIES, INC. LLC
24550 SHERWOOD
CENTER LINE, MI 48015

MEMO 4WEST

⑈023123⑈ ⑆071925046⑆ ⑈1137033⑈

Account:1137033-F, Item:2000090014, Amount:$84,060.00, Date:07/24/2006

Pay to the order of Barclay Pullman Corp
SER Technologies, Inc., LLC

PAY TO THE ORDER OF
SAUK VALLEY BANK
07112589
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION

>071125891<SAUK VLY B&T STERLING IL
P02 1400090012 07-24-2006

Account:1137033-F, Item:2000090014, Amount:$84,060.00, Date:07/24/2006

EXHIBIT A

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 9-19-06

CURRENCY	
COIN	
TOTAL CASH	
CHECKS	
1	1516.99
2	4510.50
3	2559.17
4	30118.80
TOTAL FROM ATTACHED LIST	
	64705.46

SAUK VALLEY BANK & TRUST CO.
STERLING, IL 61081

TOTAL ITEMS 4 $ 64,705.46

⑆071125891⑆ 100495501⑈ 42

Account: 100495501-D, Item: 1200290001, Amount: $64,705.46, Date: 09/19/2006

Account: 100495501-D, Item: 1200290001, Amount: $64,705.46, Date: 09/19/2006

23207

GREAT LAKES CONTROLLED ENERGY CORPORATION
630 BONNIE LANE
ELK GROVE VILLAGE, IL 60007

AMERICAN CHARTERED BANK
SCHAUMBURG, ILLINOIS 60173
70-2504-719

9/7/2006

PAY TO THE ORDER OF SER TECHOLOGIES, INC. LLC $ **4,510.50

Four Thousand Five Hundred Ten and 50/100 DOLLARS

SER TECHOLOGIES, INC. LLC
24550 SHERWOOD
CENTER LINE, MI 48015

MEMO WARRANTY WORK

⑈023207⑈ ⑆071925046⑆ ⑈1137033⑈

Account: 1137033-F, Item: 1200290003, Amount: $4,510.50, Date: 09/19/2006

Pay to the order of Barclay Pullman Corp.

PAY TO THE ORDER OF
SAUK VALLEY BANK
071125891
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account: 1137033-F, Item: 1200290003, Amount: $4,510.50, Date: 09/19/2006

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 9-29-06

CURRENCY
COIN
TOTAL CASH
CHECKS
1 Great Lakes 99,495.00

TOTAL FROM ATTACHED LIST
TOTAL 99,495.00

SAUK VALLEY BANK & TRUST CO.
STERLING, IL 61081

TOTAL ITEMS 1 $ 99,495.00

⑆071125891⑆ 10049550 1⑈ 41

Account:100495501-D, Item:1300200001, Amount:$99,495.00, Date:09/29/2006

DOCUMENT Brauer 105 9/29/06
Transkt 54 13:09:15
100495501
Total Deposit $99495.00

Account:100495501-D, Item:1300200001, Amount:$99,495.00, Date:09/29/2006

23233

GREAT LAKES CONTROLLED ENERGY CORPORATION
500 BONNIE LANE
ELK GROVE VILLAGE, IL 60007

AMERICAN CHARTERED BANK
SCHAUMBURG, ILLINOIS 60173
70-2504-719

8/22/2006

PAY TO THE ORDER OF SER TECHOLOGIES, INC. LLC $ **99,495.00

Ninety-Nine Thousand Four Hundred Ninety-Five and 00/100 DOLLARS

SER TECHOLOGIES, INC. LLC
24050 SHERWOOD
CENTER LINE, MI 48015

MEMO July application for payment

⑈023233⑈ ⑆071925046⑆ 1137033⑈

Account:1137033-F, Item:1300200002, Amount:$99,495.00, Date:09/29/2006

PAY TO THE ORDER OF
SAUK VALLEY BANK
071125891
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account:1137033-F, Item:1300200002, Amount:$99,495.00, Date:09/29/2006

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 10-13-06

CURRENCY
COIN
TOTAL CASH
CHECKS

106,731.70
29,555.11
17,913.52
18,260.76

TOTAL FROM ATTACHED LIST
TOTAL $172,461.09

SAUK VALLEY BANK & TRUST CO.
STERLING, IL 61081

TOTAL ITEMS 4 $ 172,461.09

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:1600120071, Amount:$172,461.09, Date:10/23/2006

Account:100495501-D, Item:1600120071, Amount:$172,461.09, Date:10/23/2006

23286

GREAT LAKES CONTROLLED ENERGY CORPORATION
630 BONNIE LANE
ELK GROVE VILLAGE, IL 60007

AMERICAN CHARTERED BANK
SCHAUMBURG, ILLINOIS 60173
70-2804-719

10/18/2006

PAY TO THE ORDER OF SER TECHOLOGIES, INC. LLC $ **106,731.70

One Hundred Six Thousand Seven Hundred Thirty-One and 70/100****** DOLLARS

SER TECHOLOGIES, INC. LLC
24650 SHERWOOD
CENTER LINE, MI 48015

MEMO APPLICATION #5

⑈023286⑈ ⑆071925046⑆ ⑈1137033⑈

Account:1137033-F, Item:1600120072, Amount:$106,731.70, Date:10/23/2006

PAY TO THE ORDER OF SAUK VALLEY BANK
071125891
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account:1137033-F, Item:1600120072, Amount:$106,731.70, Date:10/23/2006

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 11-22-06

CURRENCY
COIN
TOTAL CASH
CHECKS
Great Lakes 94,544.44
TOTAL FROM ATTACHED LIST
94,544.44

SAUK VALLEY BANK & TRUST CO.
STERLING, IL 61081

TOTAL ITEMS 1 $ 94,544.44

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:1500050001, Amount:$94,544.44, Date:11/22/2006

DOCUMENT Drawer: 105 11/22/06
Transit: 73 13:43:22
100495501
Total Deposit $94544.44

Account:100495501-D, Item:1500050001, Amount:$94,544.44, Date:11/22/2006

23322

GREAT LAKES CONTROLLED
ENERGY CORPORATION
650 BONNIE LANE
ELK GROVE VILLAGE, IL 60007

AMERICAN CHARTERED BANK
SCHAUMBURG, ILLINOIS 60173
70-2504-719

11/21/2006

PAY TO THE ORDER OF SER TECHOLOGIES, INC. LLC $ **94,544.44

Ninety-Four Thousand Five Hundred Forty-Four and 44/100 DOLLARS

SER TECHOLOGIES, INC. LLC
24650 SHERWOOD
CENTER LINE, MI 48015

MEMO PAY REQUEST #5

⑈023322⑈ ⑆071925046⑆ ⑈1137033⑈

Account:1137033-F, Item:1500050002, Amount:$94,544.44, Date:11/22/2006

Pay to the order of
Barclay Pullman Corp.

PAY TO THE ORDER OF
SAUK VALLEY BANK
071125891
100495501
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION

Account:1137033-F, Item:1500050002, Amount:$94,544.44, Date:11/22/2006

EXHIBIT B

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 7-26-06

CURRENCY
COIN
TOTAL CASH
CHECKS

TOTAL FROM ATTACHED LIST

6,878.15

SAUK VALLEY BANK & TRUST CO.

TOTAL ITEMS 1 $ 6,878.15

⑆071125891⑆ 10049550 1⑈ 41

Account:100495501-D, Item:1300050040, Amount:$6,878.15, Date:07/26/2006

Total deposit $6878.15
100495501
Transit 06 11:52:32
Document Drawer 101 7/26/06

Account:100495501-D, Item:1300050040, Amount:$6,878.15, Date:07/26/2006

uniqema
A member of the ICI Group
315 Cherry Lane
New Castle, DE 19720

JPMorgan Chase Bank, N.A.
Syracuse, New York

CHECK DATE 07/20/2006
CHECK NUMBER 2490410111

PAY IN U.S. DOLLARS
*******SIX THOUSAND EIGHT HUNDRED SEVENTY EIGHT AND 15/100 DOLLARS*******

$6,878.15

TO THE ORDER OF SER TECHNOLOGIES LLC

5719

AUTHORIZED SIGNATURE

⑈2490410111⑈ ⑆021309379⑆ 601⑉8⑉69332⑈

Account:601869332-F, Item:1300050041, Amount:$6,878.15, Date:07/26/2006

55757455

PAY TO THE ORDER OF
SAUK VALLEY BANK
071125891
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account:601869332-F, Item:1300050041, Amount:$6,878.15, Date:07/26/2006

EXHIBIT
B

Sauk Valley Bank & Trust Company

THE FACE OF THIS DOCUMENT HAS A BLUE BACKGROUND - THE BACK HAS AN ARTIFICIAL WATERMARK

uniqema
A MEMBER OF THE ICI GROUP
315 CHERRY LANE
NEW CASTLE, DE 19720

JPMorgan Chase Bank, N.A.
Syracuse, New York

50-937
213

CHECK DATE 08/03/2006
CHECK NUMBER 2490410246

PAY IN U.S. DOLLARS
****************ONE THOUSAND THREE HUNDRED AND 00/100 DOLLARS****************

$1,300.00

TO THE ORDER OF SER TECHNOLOGIES LLC

5047

AUTHORIZED SIGNATURE

⑈2490410246⑈ ⑆021309379⑆ 601⑉869332⑈

Account:601869332-F, Item:1600050026, Amount:$1,300.00, Date:08/11/2006

56122377

ENDORSE HERE PAY TO THE ORDER
X OF BARCLAY PULLMAN CORP.

PAY TO THE ORDER OF
SAUK VALLEY BANK
971125681
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100456531

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
DEPOSITORY BANK ENDORSEMENT

Account:601869332-F, Item:1600050026, Amount:$1,300.00, Date:08/11/2006

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 9-15-06

SAUK VALLEY BANK & TRUST CO.
STERLING, IL 61081

TOTAL ITEMS 2 $ 14,058.00

14,058.00

⑈071125891⑈ 10049550 1⑈ 44

Account:100495501-D, Item:1400060023, Amount:$14,058.00, Date:09/15/2006

Account:100495501-D, Item:1400060023, Amount:$14,058.00, Date:09/15/2006

uniqema
JPMorgan Chase Bank, N.A.
Syracuse, New York
50-937/213

CHECK DATE 09/08/2006
CHECK NUMBER 2490410624

PAY IN U.S. DOLLARS
******THIRTEEN THOUSAND FOUR HUNDRED SIXTY FOUR AND 92/100 DOLLARS******

$13,464.92

TO THE ORDER OF ...SER TECHNOLOGIES LLC

8120

AUTHORIZED SIGNATURE

⑈2490410624⑈ ⑆021309379⑆ 601⑈869332⑈

Account:601869332-F, Item:1400060024, Amount:$13,464.92, Date:09/15/2006

56764854

PAY TO THE ORDER OF
SAUK VALLEY BANK
071125891
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account:601869332-F, Item:1400060024, Amount:$13,464.92, Date:09/15/2006

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 9-27-06

CURRENCY	
COIN	
TOTAL CASH	
CHECKS	11,890.99
	6,972.00
	306.00
TOTAL	19,168.99

SAUK VALLEY BANK & TRUST CO.
STERLING, IL 61081

TOTAL ITEMS 3 $ 19,168.99

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:1200100003, Amount:$19,168.99, Date:09/27/2006

Account:100495501-D, Item:1200100003, Amount:$19,168.99, Date:09/27/2006

uniqema
A member of the ICI Group
315 Cherry Lane
New Castle, DE 19720

JPMorgan Chase Bank, N.A.
Syracuse, New York

50-937/213

CHECK DATE 09/21/2006
CHECK NUMBER 2490410746

PAY IN U.S. DOLLARS
*****SIX THOUSAND NINE HUNDRED SEVENTY TWO AND 00/100 DOLLARS*********

$6,972.00

TO THE ORDER OF SER TECHNOLOGIES LLC

5564

AUTHORIZED SIGNATURE

⑈2490410746⑈ ⑆021309379⑆ 601⑈869332⑈

Account:601869332-F, Item:1200100005, Amount:$6,972.00, Date:09/27/2006

56989206

PAY TO THE ORDER OF
SAUK VALLEY BANK
071125891
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account:601869332-F, Item:1200100005, Amount:$6,972.00, Date:09/27/2006

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 10-3-06

CURRENCY
COIN
TOTAL CASH
CHECKS 27,356.95

TOTAL 27,356.95

SAUK VALLEY BANK & TRUST CO.
STERLING, IL

TOTAL ITEMS 1 $ 27,356.95

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:1300020034, Amount:$27,356.95, Date:10/03/2006

DOCUMENT DRAWER 101 10/03/06
TRANSIT 51 13:02:06
100495501
DDA DEPOSIT $27,356.95

Account:100495501-D, Item:1300020034, Amount:$27,356.95, Date:10/03/2006

THE FACE OF THIS DOCUMENT HAS A BLUE BACKGROUND • THE BACK HAS AN ARTIFICIAL WATERMARK

uniqema
A company of The ICI Group
315 Cherry Lane
New Castle, DE 19720

JPMorgan Chase Bank, N.A.
Syracuse, New York

50-937
213

CHECK DATE 09/20/2006
CHECK NUMBER 2490410817

PAY IN U.S. DOLLARS
******TWENTY SEVEN THOUSAND THREE HUNDRED FIFTY SIX AND 95/100 DOLLARS*****

$27,356.95

TO THE ORDER OF SER TECHNOLOGIES LLC

4515

AUTHORIZED SIGNATURE

⑈2490410817⑈ ⑆021309379⑆ 601⑉869332⑈

Account:601869332-F, Item:1300020035, Amount:$27,356.95, Date:10/03/2006

57112624

PAY TO THE ORDER OF BARCLAY PULLMAN CORP.

PAY TO THE ORDER OF
SAUK VALLEY BANK
071112589
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account:601869332-F, Item:1300020035, Amount:$27,356.95, Date:10/03/2006

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EXHIBIT C

Sauk Valley Bank & Trust Company

BARCLAY POLLAR CORPORATION

DATE 9-7-06

SAUK VALLEY BANK & TRUST CO.

TOTAL ITEMS 4 $ 75,285.53

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:1300190018, Amount:$75,285.53, Date:09/07/2006

Account:100495501-D, Item:1300190018, Amount:$75,285.53, Date:09/07/2006

TUTHILL CORPORATION

DATE 08/25/2006 CHECK NUMBER 152556114

VOID AFTER 90 DAYS AMOUNT

PAY *** ONE THOUSAND ONE HUNDRED TWENTY-FIVE USD and 50/100 *** USD ********1,125.50*

TO THE ORDER OF SER Technologies, LLC 24650 Sherwood Center Line MI 48015

TUTHILL CORPORATION

AUTHORIZED SIGNATURE

⑈152556114⑈ ⑆071000505⑆ 5800281320⑈

Account:5800281320-F, Item:1300190021, Amount:$1,125.50, Date:09/07/2006

SER TECHNOLOGIES LLC

Account:5800281320-F, Item:1300190021, Amount:$1,125.50, Date:09/07/2006

EXHIBIT C

Sauk Valley Bank & Trust Company

TUTHILL CORPORATION

DATE 09/08/2006 CHECK NUMBER 1525749

VOID AFTER 90 DAYS

AMOUNT

PAY *** FIVE HUNDRED NINETY-THREE USD and 08/100 ***

USD ***********593.08*

TO THE ORDER OF
SER Technologies, LLC
24650 Sherwood
Center Line MI 48015

TUTHILL CORPORATION

AUTHORIZED SIGNATURE

⑈1525749⑈ ⑆071000505⑆ 5800 28 13 20⑈

Account:5800281320-F, Item:1400060025, Amount:$593.08, Date:09/15/2006

ENDORSE HERE
PAY TO THE ORDER OF
BARCLAY PULLMAN CORP.

PAY TO THE ORDER OF
SAUK VALLEY BANK
071112519
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

Account:5800281320-F, Item:1400060025, Amount:$593.08, Date:09/15/2006

Sauk Valley Bank & Trust Company

TUTHILL CORPORATION

DATE 09/25/2006 CHECK NUMBER 15259755

VOID AFTER 90 DAYS

AMOUNT

PAY *** TWO HUNDRED SIXTEEN USD and 25/100 ***

USD ************216.25*

TO THE ORDER OF SER TECHNOLOGIES
24650 SHERWOOD
Center Line MI 48015

TUTHILL CORPORATION

AUTHORIZED SIGNATURE

⑈15259755⑈ ⑆0?1000505⑆ 5800?81320⑈

Account:5800281320-F, Item:1500230044, Amount:$216.25, Date:09/25/2006

ENDORSE HERE
Pay to the order of Lasalle Pullman Bank

PAY TO THE ORDER OF
SAUK VALLEY BANK
071113681
FOR DEPOSIT ONLY
TUTHILL CORPORATION

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

Account:5800281320-F, Item:1500230044, Amount:$216.25, Date:09/25/2006

EXHIBIT D

Sauk Valley Bank & Trust Company

at&t

Chase Bank USA, N.A.
Wilmington, DE

5230-04

Date 09/01/2006

Check Number 3840072685

Pay this amount

PAY
NINETEEN THOUSAND EIGHT HUNDRED SEVENTY-ONE AND 00/100

1100461 J200

To the order of
SER TECHNOLOGIES LLC
24650 SHERWOOD
CENTER LINE MI 48015

Void 180 days from check date

⑈3840072685⑈ ⑆031100267⑆6301532309509⑈

Account:6301532309509-F, Item:1300190022, Amount:$19,871.00, Date:09/07/2006

66872290

SER TECHNOLOGIES LLC

PAY TO THE ORDER OF
SAUK VALLEY BANK
071112591
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
00491801

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

Account:6301532309509-F, Item:1300190022, Amount:$19,871.00, Date:09/07/2006

EXHIBIT
D

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 10-25-06

CURRENCY	
COIN	
TOTAL CASH	
CHECKS	
AT&T	3448 99
Sand Stone	77600 00
TOTAL FROM ATTACHED LIST	
TOTAL	81,048.99

SAUK VALLEY BANK & TRUST CO. STERLING, IL 61081

TOTAL ITEMS 2 $ 81,048.99

⑆071125891⑆ 100495501⑈ 11

Account:100495501-D, Item:1300080013, Amount:$81,048.99, Date:10/25/2006

10/25/06 10⁄1 DEPOSIT Customer
131303.16 12 1133451
81048.99 100495501 EOD 0425II

Account:100495501-D, Item:1300080013, Amount:$81,048.99, Date:10/25/2006

THE BACK OF THIS CHECK CONTAINS A SECURITY MARK • DO NOT ACCEPT WITHOUT HOLDING AT AN ANGLE TO VERIFY SECURITY MARK

at&t

Chase Bank USA, N.A. Wilmington, DE 62-26 311 5250-07

Date 10/18/2006 Check Number 3840075114

Pay this amount ****3,448.99

PAY THREE THOUSAND FOUR HUNDRED FORTY-EIGHT AND 99/100*****

To the order of
SER TECHNOLOGIES LLC
24650 SHERWOOD
CENTER LINE MI 48015

Void 180 days from check date

⑈3840075114⑈ ⑆031100267⑆6301532309509⑈

Account:6301532309509-F, Item:1300080014, Amount:$3,448.99, Date:10/25/2006

67656174

Document Security Features:
- Toner Adhesion
- Warn Printing
- Chemically Sensitized Paper
- Security Mark – Hold at angle to view

FEDERAL RESERVE BANK REGULATION CC

DO NOT WRITE, STAMP OR ENDORSE BELOW THIS LINE

Pay to the order of
PAY TO THE ORDER OF SAUK VALLEY BANK, STERLING, IL
071125891
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
100495501

Account:6301532309509-F, Item:1300080014, Amount:$3,448.99, Date:10/25/2006

Case 1:08-cv-07033 Document 1 Filed 12/09/2008 Page 40 of 49

EXHIBIT E

Sauk Valley Bank & Trust Company

BARCLAY PULLMAN CORPORATION

DATE 8-11-06

ENDORSE & LIST CHECKS SEPARATELY OR ATTACH LIST

	DOLLARS	CENTS
CURRENCY		
COIN		
TOTAL CASH		
CHECKS		
1	368	00
2	1,300	00
3	25,653	00
TOTAL FROM ATTACHED LIST		
TOTAL	27,321	00

SAUK VALLEY BANK & TRUST CO.
STERLING, IL 61081

TOTAL ITEMS 3 $ 27,321.00

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:1600050024, Amount:$27,321.00, Date:08/11/2006

TOTAL DEPOSIT 27321.00
100495501
TRANSIT 120 11:20:58
DOCUMENT DRAWER 102 8/11/06

Account:100495501-D, Item:1600050024, Amount:$27,321.00, Date:08/11/2006

verizon

08/02/2006 1005179814

**************368.00*

PAY EXACTLY ***THREE HUNDRED SIXTY-EIGHT USD and ZERO Cents***

Void After 120 Days

TO THE ORDER OF SER TECHNOLOGY LLC
24650 SHERWOOD
CENTER LINE MI 48015

⑈1005179814⑈ ⑆071923284⑆ 8765850125⑈

Account:8765850125-F, Item:1600050025, Amount:$368.00, Date:08/11/2006

PAY TO THE ORDER OF SAUK VALLEY BANK 071125891 FOR DEPOSIT ONLY BARCLAY PULLMAN CORPORATION 100495501

verizon verizon verizon

The security features listed below, as well as those not listed, exceed industry guidelines.

FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

Account:8765850125-F, Item:1600050025, Amount:$368.00, Date:08/11/2006

EXHIBIT E

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EXHIBIT F

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ACCESS SYSTEMS
P.O. Box 50444
Indianapolis, Indiana 46250

356419 08/10/2006 13691

CHECK AMOUNT
25,653.00

TWENTY-FIVE THOUSAND SIX HUNDRED FIFTY-THREE AND 00/100

VOID AFTER 60 DAYS

PAY TO THE ORDER OF
BCR TECHNOLOGIES, LLC
24650 SHERWOOD
CENTER LINE, MI 48015

2 SIGNATURES REQUIRED OVER $10,000.00

⑈356419⑈ ⑆011900445⑆ 69642⑈

Account:69642-F, Item:1600050027, Amount:$25,653.00, Date:08/11/2006

Pay to the order of
Barclay Pullman Corp.

PAY TO THE ORDER OF
SAUK VALLEY BANK
071126981
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION
10045551

Account:69642-F, Item:1600050027, Amount:$25,653.00, Date:08/11/2006

EXHIBIT
F

EXHIBIT G

Sauk Valley Bank & Trust Company

DATE 9-25-06

CURRENCY		
COIN		
TOTAL CASH		
CHECKS	34,396	33
	2161	25
	47,711	00
TOTAL	$82,323	58

SAUK VALLEY BANK & TRUST CO. STERLING, IL 61081

TOTAL ITEMS 3 $ 82,323.58

⑆071125891⑆ 100495501⑈ 41

Account:100495501-D, Item:1500230041, Amount:$82,323.58, Date:09/25/2006

Total Deposit 82323.58
10049550
Transact 205
Document Operator 101 9/25/06

Account:100495501-D, Item:1500230041, Amount:$82,323.58, Date:09/25/2006

MATTESON SCHOOL DISTRICT #162
PARK FOREST, ILLINOIS
HARRIS TRUST AND SAVINGS BANK
ROSELLE, ILLINOIS
VOID AFTER 90 DAYS

NO. 092226

DATE	CHECK NUMBER
9/20/2006	092226

CHECK AMOUNT $47,711.00 **

PAY FORTY-SEVEN THOUSAND SEVEN HUNDRED ELEVEN AND NO/100 DOLLARS

TO THE ORDER OF SER TECHNOLOGIES, INC.
34650 SHERWOOD
CENTER LINE MI 48015

TOWNSHIP SCHOOL TREASURER TOWNSHIP [illegible]

⑈092226⑈ ⑆071915580⑆ 04⑈297⑈575⑈3⑈

Account:42975753-F, Item:1500230043, Amount:$47,711.00, Date:09/25/2006

X PAY TO THE ORDER OF [illegible]
PAY TO THE ORDER OF SAUK VALLEY BANK
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION

Account:42975753-F, Item:1500230043, Amount:$47,711.00, Date:09/25/2006

EXHIBIT
G

EXHIBIT H

Sauk Valley Bank & Trust Company

URBAN GROWTH PROPERTY TRUST
MANAGED BY TC NE METRO, INC.
IRVING
TX 75063

0004067

September 20, 2006

$************306.00*

First Tennessee Bank

SER TECHNOLOGIES LLC
24650 SHERWOOD
CENTER LINE, MI. 48015

⑈0004067⑈ ⑆064000025⑆ 10⑉0590578⑈

Account:100590578-F, Item:1200100006, Amount:$306.00, Date:09/27/2006

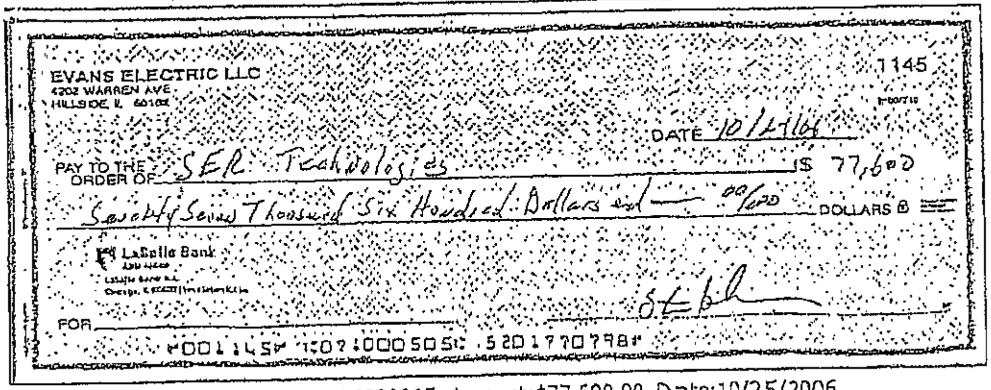
PAY TO THE ORDER OF
SAUK VALLEY BANK
071125381
FOR DEPOSIT ONLY

Account:100590578-F, Item:1200100006, Amount:$306.00, Date:09/27/2006

EXHIBIT
H

EXHIBIT I

Sauk Valley Bank & Trust Company


EVANS ELECTRIC LLC
4202 WARREN AVE
HILLSIDE IL

1145

DATE 10/24/06

PAY TO THE ORDER OF SER Technologies $ 77,600

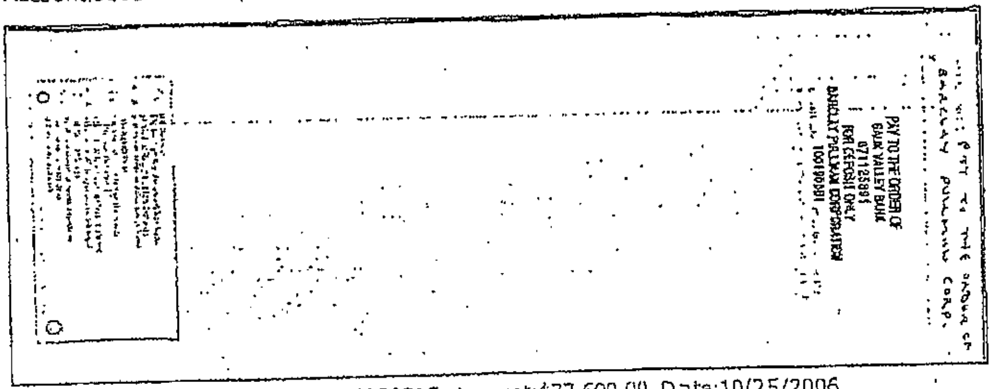
Seventy Seven Thousand Six Hundred Dollars and 00/100 DOLLARS

LaSalle Bank

FOR

⑈001145⑈ ⑆071000505⑆ 5201770798⑈

Account:5201770798-F, Item:1300080015, Amount:$77,600.00, Date:10/25/2006


PAY TO THE ORDER OF
SAUK VALLEY BANK
FOR DEPOSIT ONLY
BARCLAY PULLMAN CORPORATION

Account:5201770798-F, Item:1300080015, Amount:$77,600.00, Date:10/25/2006

EXHIBIT
I